

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	Chapter 13
)	
ROBERT J. MCGRODY, JR.)	Case No. 19-11489-amc
TERESA M. MCGRODY,)	
)	
Debtor s)	
)	

**NOTICE OF APPEARANCE AND
DEMAND FOR NOTICES AND PAPERS**

Please take notice that Goldstein Law Partners, LLC hereby enters its appearance on behalf of creditors Michael Coccozza and Shawn Mattison, Co-Trustees of Robert D. Mattison Trust, pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rule 901(b); and such counsel hereby request, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and 11 U.S.C. §§ 342 and 1109(b), that copies of all notices and pleadings given or filed in this case be given and served upon the person listed below at the following address and telephone number:

Shawn M. Rodgers, Esq.
PA Attorney I.D. 307598
GOLDSTEIN LAW PARTNERS, LLC
11 Church Road
Hatfield, PA 19440
Telephone: 610.949.0444
Facsimile: 610.296.7730
Email: srodders@goldsteinlp.com

Please take further notice that, pursuant to 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings herein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of the rights of Michael Cocozza and Shawn Mattison, Co-Trustees of Robert D. Mattison Trust, to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or any other rights, claims, actions, setoffs, or recoupments to which he is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Michael Cocozza and Shawn Mattison, Co-Trustees of Robert D. Mattison Trust, expressly reserve.

GOLDSTEIN LAW PARTNERS, LLC

Date: January 14, 2020

By: /s/ **Shawn M. Rodgers**
Shawn M. Rodgers
PA Attorney I.D. 307598
11 Church Road
Hatfield, PA 19440
Telephone: 610.949.0444
Facsimile: 610.296.7730
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Attorneys for Michael Cocozza and Shawn Mattison, Co-Trustees of Robert D. Mattison Trust

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CERTIFICATE OF SERVICE

I, Shawn M. Rodgers, Esq., counsel for creditors Michael Cocozza and Shawn Mattison, Co-Trustees of Robert D. Mattison Trust, hereby certify that I caused true and correct copies of my Notice of Appearance and Demand for Notices and Papers of Goldstein Law Partners, LLC to be served, via the Court's electronic filing system on the following parties as follows on the date noted below:

Erik B. Jensen, Esq.
Jensen Bagnato, P.C.
1500 Walnut Street, Suite 1920
Philadelphia, PA 19102
(Counsel for Debtors)

and

Jack K. Miller, Esq.
The Bourse Building
111 S. Independence Mall East
Philadelphia, PA 19106
(Counsel for William C. Miller, Esq., Standing Trustee)

and

Office of the U.S. Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19103
(United States Trustee)

and

Kevin G. McDonald, Esq.
KML Law Group, P.C.
The Lits Building
701 Market Street, Suite 5000
Philadelphia, PA 19106
(Counsel for Creditor Lakeview Loan Servicing, LLC)

Date: January 14, 2020

By: /s/ *Shawn M. Rodgers*
Shawn M. Rodgers